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6 Attorney for Mark Han

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 MARK HAN,  
15 Defendant.

Case No. 2:14-cr-278-JAD-VCF

**UNOPPOSED MOTION TO  
MODIFY CONDITIONS TO  
PERMIT TRAVEL**

**(Expedited Treatment Requested)**

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17 Comes now the defendant, Mark Han, by and through his counsel of record, Raquel  
18 Lazo, Assistant Federal Public Defender, and hereby files this Unopposed Motion to Modify  
19 Conditions to Permit Travel. This request is based on the Points and Authorities attached  
20 hereto.

21 DATED this 2<sup>nd</sup> of February, 2016

22  
23 RENE L. VALLADARES  
Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO  
Assistant Federal Public Defender  
26 Attorney for Mark Han

**POINTS AND AUTHORITIES**

1) On August 7, 2014, Mr. Han was released on PR Bond with conditions. He was ordered to surrender his passport to pretrial services and his travel was limited to Clark County, Nevada.

2) On January 21, 2016, this court granted Mr. Han's request to modify his conditions to permit him to travel to Denver, Colorado to attend a football game. Order (#47). Mr. Han's boss, Josh Gust, was rewarding a couple of his employees with tickets to see the game. Due to bad weather conditions, the group was unable to travel.

3) Mr. Han now seeks permission to travel to Glendale, Arizona for a hockey game. Mr. Gust is taking the group and Mr. Han will be traveling with him. As this court may recall, Mr. Gust attended Mr. Han's sentencing. Mr. Han will leave on Thursday February 4, 2016 and return the following day on Friday February 5, 2016.

4) Both the government and Pretrial Officer Kapanui have no opposition to Defendant's request.

Dated 2<sup>nd</sup> day of February, 2016.

Respectfully submitted,

By: /s/Raquel Lazo

RAQUEL LAZO  
Assistant Federal Public Defender  
Attorney for Mark Han

**IT IS SO ORDERED:**   
UNITED STATES DISTRICT JUDGE

DATED: February 2, 2016.

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on February 2, 2016, he served an electronic copy of the above and foregoing Unopposed Motion to Modify Conditions to Permit Travel (Expedited Treatment Requested) by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
Pamela Martin  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/ Brandon Thomas  
Employee of the Federal Public Defender